

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

1. CAPTION OF ACTION

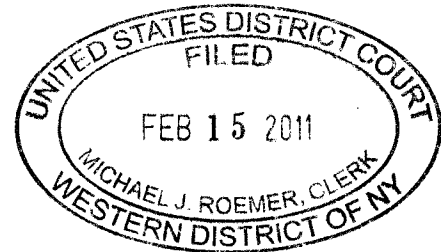
A. Full Names of Plaintiffs:

Paul G. Wright
Theresa R. Wright,

11 CV 0140-S

Minor Children of Paul and Theresa Wright:

[REDACTED] E. W.
[REDACTED] M. W.
[REDACTED] N. W.
[REDACTED] R. W.



B. Full Names of Defendants:

1. Hon. Margaret O. Szczur
2. Charles Gallagher
3. Annmarie Albanese
4. Christopher Anderson
5. Mr. James Brown
6. Phil Pawlowski
7. Yvonne Rychcik
8. Andrew J. McLaren
9. Erie County Dept. of Social Services,
10. Child Protection Services
11. Erie County Family Court
12. Emil Cappelli
13. Sam Endich
14. Kaleida Health
15. Buffalo General Hospital
16. Millard Filmore Suburban Hospital
17. Dr. McCormack
18. Dr. Wonhoon Park
19. Rite Aid Pharmacies
20. Jennifer Daege,
21. Dr Jack Coyne
22. Edward Surowiec
23. Tonawanda Pediatric
24. Dr. Justin Kanaley
25. Dr. Marybeth Lopat-Winter
26. Sandie Yeater
27. Marylou Weaver

28. Sharon Novak
29. Dr. Brian S. Joseph
30. Buffalo Medical Group
- 31 Dr. Corstiaan Brass
32. Dr. Cheryl Neely
- 33.Dr. David James
- 34.Amherst University Health Center
35. Amherst Health Center
- 36.Lifetime Health Medical Group
- 37.Dr. Barbara Stouter
- 38.Horizons Health Services
39. Gateway Longview
40. Carolyn Isbrandt
41. Susan Seawood
42. Stacey Sowinski
43. Lauren Dombrowski
44. Michelle Federowicz
45. Janet Kelly
46. Linda Beckinghausen
47. David Beckinghausen
48. Chrisy Smith, Gateway
49. Cheri Carroll-Alvarez
50. Child Advocacy Center Inc
51. Deborah Dee, Child Advocacy Center Inc
52. Family Care Medicine
53. Dr. James Panzarella
54. NY Appellate Division., Fourth Department.
55. Hon. Scudder
56. Hon. P.J., Hurlbutt
57. Hon. Martoche
58. Hon. Smith
59. Hon. Centra, JJ.

2. STATEMENT OF JURISDICTION, VENUE and NATURE OF SUIT

A. Basis of jurisdiction in Federal Court: This action is brought pursuant to 18 U.S.C. § 1621, 18 U.S.C. §§ 1962, and 1964, 42 U.S.C. §§ 1983, 1988 and the First, Fourth, Fifth, Seventh, Eighth, Fourteenth Amendments of the Constitution of the United States of America and HIPAA of 1996. Jurisdiction is based on Title 28 U.S.C. §§ 1331 and 1343(1), (2), (3), (4) and the aforementioned statutory and constitutional provisions.

B. Reason for venue in the Western District: Pursuant to 28 USC § 1391 *et. seq.* venue is proper in the Western District of New York as a majority of the defendants reside therein and the transactions and occurrences complained of, occurred in the Western District of New York.

C. Nature of suit: This is a civil rights and civil RICCO claim.

3. PARTIES TO THIS ACTION

PLAINTIFF'S INFORMATION

Paul G Wright, 577 Campbell Blvd, Getzville, NY 14068

Theresa R Wright, 577 Campbell Blvd, Getzville, NY 14068

E.W. [REDACTED] a minor child residing with parents Paul and Theresa Wright.
M.W. [REDACTED] a minor child residing with parents Paul and Theresa Wright.
N.W. [REDACTED] a minor child residing with parents Paul and Theresa Wright.
P.W. [REDACTED] a minor child residing with parents Paul and Theresa Wright.

DEFENDANTS INFORMATION

ALL DEFENDANTS, WHERE THE DEFENDANTS ARE PERSONS, FOR ALL TIMES RELEVANT TO THIS CAUSE OF ACTION ARE BEING SUED IN THEIR PROFESSIONAL AND INDIVIDUAL CAPACITY.

Hon. Margaret O. Szczur, Family Court Judge, Erie County One Niagara Plaza., Floor 7, Buffalo, NY 14202

Charles Gallagher, Attorney, 95 Franklin St, 7th Floor Buffalo, NY 14202

Annmarie Albanese, Child Protection Services, 478 Main St., Buffalo, NY 14202

Christopher Anderson, Child Protection Services, 478 Main St., Buffalo, NY 14202

Mr. James Brown, Attorney for Erie County, 478 Main St Buffalo, NY 14202

Phil Pawlowski, Child Protection Services, 478 Main St., Buffalo, NY 14202

Yvonne Rychcik, Child Protection Services, 478 Main St., Buffalo, NY 14202

Andrew J. McLaren, Gateway Longview, 605 Niagara St, Buffalo, NY 14201

Erie County Dept. of Social Services, 478 Main St Buffalo, NY 14202

Child Protection Services 478 Main St Buffalo, NY 14202

Erie County Family Court, One Niagara Plaza, Buffalo, NY 14202

Emil J. Cappelli, (ECDSS Office of Counsel) 478 Main St Buffalo, NY 14202

Sam Endich, 175 Heim Rd., Williamsville, NY 14221

Kaleida Health, Corporate Offices, 100 High Street, Buffalo, NY 14203

Buffalo General Hospital, 100 High St Buffalo, NY 14203

Millard Fillmore Suburban Hospital, 1540 Maple Rd, Williamsville, NY 14221

Dr. McCormack, Buffalo General Hospital, 100 High St Buffalo, NY 14203

Dr. Wonhoon Park, Buffalo General Hospital, 100 High St Buffalo, NY 14203

Rite Aid Pharmacies, 3545 Millersport Highway, Getzville, NY 14068

Rite Aid Pharmacies, 30 Hunter Lane, Camp Hill, PA. 17011

Jennifer Daege, Rite Aid Pharmacies, 3545 Millersport Highway, Getzville, NY 14068

Dr Jack Coyne, 565 Abbott Rd. Buffalo, NY 14220

Edward Surowiec, III, Rite Aid Pharmacies, 3545 Millersport Highway, Getzville, NY 14068

Tonawanda Pediatrics, 3500 Robinson Rd., West Amherst, NY 14228

Dr. Justin Kanaley, Tonawanda Pediatrics, 3500 Robinson Rd., West Amherst, NY 14228

DEFENDANTS INFORMATION (Continued)

ALL DEFENDANTS, where the defendants are persons, for all times relevant to this cause of action are being sued in their professional and individual capacity

Dr. Marybeth Lopat-Winter, Tonawanda Pediatrics, 3500 Robinson Rd., West Amherst, NY 14228

Sandie Yeater, Tonawanda Pediatrics, 3500 Robinson Rd., West Amherst, NY 14228

Marylou Weaver, Tonawanda Pediatrics, 3500 Robinson Rd., West Amherst, NY 14228

Sharon Novak, Tonawanda Pediatrics, 3500 Robinson Rd., West Amherst, NY 14228

Dr. Brian S. Joseph, 5820 Main Street # 206 Williamsville, NY 14221

Buffalo Medical Group, 2355 Union Rd., Cheektowaga, NY 14227

Dr. Corstiaan Brass, 2355 Union Rd., Cheektowaga, NY 14227

Dr. Cheryl Neely, Millard Fillmore Suburban Hospital, 1540 Maple Rd, Williamsville, NY 14221

Dr. David James, Millard Fillmore Suburban Hospital, 1540 Maple Rd, Williamsville, NY 14221

Amherst University Health Center, 1185 Sweet Home Rd, Buffalo, NY 14226

Amherst Health Center, 1185 Sweet Home Rd, Buffalo, NY 14226

Lifetime Health Medical Group, 1185 Sweet Home Road, Amherst, NY 14226

Dr. Barbara Stouter, 1185 Sweet Home Road, Amherst, NY 14226

Horizons Health Services, 1370 Niagara Falls Boulevard

Gateway Longview, 605 Niagara St, Buffalo, NY 14201

Carolyn Isbrandt, Gateway Longview, 605 Niagara St, Buffalo, NY 14201

Susan Seawood, Gateway Longview, 605 Niagara St, Buffalo, NY 14201

Stacey Sowinski, Gateway Longview, 605 Niagara St, Buffalo, NY 14201

Lauren Dombrowski, Gateway Longview, 605 Niagara St, Buffalo, NY 14201

Michelle Federowicz, Gateway Longview, 605 Niagara St, Buffalo, NY 14201

Janet Kelly, 188 Seabrook, Williamsville, NY 14221,

Linda Beckinghausen 5155 Foxtrace, Williamsville, NY 14221

David Beckinghausen 5155 Foxtrace, Williamsville, NY 14221

Chrisy Smith, Gateway Longview, 605 Niagara St, Buffalo, NY 14201

Cheri Carroll-Alvarez, Gateway Longview, 605 Niagara St, Buffalo, NY 14201

Child Advocacy Center Inc, 556 Franklin Street, Buffalo, NY, 14202

Deborah Dee, Child Advocacy Center Inc, 556 Franklin Street, Buffalo, NY, 14202

Family Care Medicine, 1208 Niagara Falls Blvd., Tonawanda, NY 14150

Dr. James Panzarella, 1208 Niagara Falls Blvd., Tonawanda, NY 14150

NY Appellate Division., Fourth Department., 50 East Avenue . Rochester, New York 14604

Hon. Scudder, 50 East Avenue . Rochester, New York 14604

Hon. P.J., Hurlbutt, 50 East Avenue . Rochester, New York 14604

Hon. Martoche, 50 East Avenue . Rochester, New York 14604

Hon. Smith, 50 East Avenue . Rochester, New York 14604

Hon. Centra, JJ., 50 East Avenue . Rochester, New York 14604

4. PREVIOUS LAWSUITS IN STATE AND FEDERAL COURT

A. Have you begun any other lawsuits in state or federal court dealing with the same facts involved in this action?

YES _____ NO X

5. STATEMENT OF CLAIM

A. FIRST CLAIM:

1. On February 10, 2011, after three years of suffering and searching in fear, (fear that CPS would once again pounce on our family), searching for the cause of multiple debilitating symptoms, Theresa Wright was finally diagnosed to a medical certainty with at least two forms of parasitic infection. Parasites that Theresa knew were present but no doctor had been able to diagnose until February 10th and thereby treat properly. Parasites can be a very difficult infection to diagnose but not an impossible one. According to the Center for Disease Control, (CDC) one of the most universal complaints of a parasitic infection is "abdominal pain", a common complaint of several Wright family members in every contact with not only the medical community but also with everyone connected with CPS, the county and the court. A simple search from the CDC home page <http://www.cdc.gov/> using the key words "parasites life threatening" recently yielded about 1160 results. To ignore such readily available information is not a reasonable act. To not exhaust all available tests to identify the source of an infection but instead to prosecute someone for it is unconscionable.

2. According to the CDC's web site:

"Diagnosis of any stool parasite may be difficult; by submitting several stool specimens, your chance of being diagnosed correctly is **higher** than by submitting just one sample.

3. **If you receive a negative lab report**, your physician may choose to send another sample to a different lab for confirmation." http://www.cdc.gov/parasites/references_resources/diagnosis.html . Please note that several specimens only make the possibility of a correct diagnoses "higher" not "certain" and a "negative" result is by no means "overwhelming medical evidence" as claimed by the doctors, medical professionals, family court, the County of Erie and CPS.

3. From January of 2008 and continuing to February 11, 2010 the Erie County Dept. of Social Services, Child Protection Services directed its employees, contractors and agents, as listed above to seize without probable cause the four minor Wright children.
4. It is well known that their motivating factor in many of their cases is money. The defendant receives tens of thousands of dollars for every child seized. We allege that in the case of the Wright children the only motivating factor for seizure was profit.
5. All other defendants acted in support of this enterprise and their goal in this matter.
6. While we do acknowledge that there are children who truly do need help, these people overstepped their authority with the Wright family.
7. On or about February 15, 2008 Annmarie Albanese, a caseworker for CPS confronted Paul Wright on his property. She claimed that if Mr. Wright would not allow her in to inspect the home that she would return with the police and remove the children.
8. On or about February 29, 2008 Annmarie Albanese, a caseworker for CPS did submit to the Family court of Erie County, Judge Margaret O. Szczur, an application for a warrant that contained false statements that she represented as fact under oath.
9. From February 29 of 2008 and continuing to February 11, 2010 Judge Margaret O. Szczur and Erie County Family issued unconstitutional orders to Paul and Theresa Wright without sufficient probable cause.
10. On February 29, 2008 at the direction of Annmarie Albanese, a CPS caseworker, other CPS agents went to the Heim Middle school dept and illegally seized [REDACTED] and [REDACTED].
E. W. M. W.
11. On February 29, 2008 Annmarie Albanese, a CPS caseworker came to the Wright family home with two officers from the Amherst police dept and illegally seized [REDACTED].
M. W. R. W.
12. In March of 2008 Dr Jack Coyne, working for the Child Advocacy Center, Erie County Dept. of Social Services and Child Protection Services, performed examinations on the four Wright children. He did blood work and physical exams, all showed normal. When [REDACTED] complained of abdominal pain, (one of the symptoms of a parasite infection), Coyne yelled at [REDACTED] trying to convince her by coercion of volume and adult authority that it was "in her head."
E. W.
13. On or about March 10, 2008 and continuing to about February 11 2009 Judge Margaret O. Szczur ordered Paul and Theresa to refrain from certain communications with their four children mentioned above.
14. On March 13, 2008 Mr Endich, an employee of Heim Middle School, called Carolyn Isbrandt of Gateway Longview and shared private information with her about the Wright family.

15. On March 17, 2008 A report was entered by Carolyn Isbrandt regarding a "conversation" with Stacey Sowinski and Lauren Dombrowski regarding a supervised visitation that occurred on March 11, 2008 between Paul and Theresa Wright and their four minor children at a Gateway Longview facility in Williamsville, NY. The contents of this entry went directly into the CPS record base and was a complete fabrication. However, in a face to face with all the same actors that occurred on March 14, 2008 no one made any mention of any concerns of the visitation. The "concerns" did not arise until three days later, The fabricated document was then referenced by Charles Gallagher in court on April 2, 2008 as he argued against the Wright children from being removed from foster care and placed with Paul Wright's mother Laura Wright.

16. In March or early April, 2008, Mr. Endich, an employee of Heim Middle School, made a false police report to the Amherst police stating that Paul Wright had approached [REDACTED] on school grounds.

17. On January 18, 2008, Christopher Anderson a supervisor with CPS alleged, without any supporting documentation or other evidence that Theresa Wright was "having a psychotic break". His actions from that point till February 11, 2010 were consistent with this unsupported belief.

18. On March 19, 2008 and on other occasions too numerous to mention here, Christopher Anderson, in his capacity with CPS made and perpetuated statements about the Wright family that he knew to be false.

19 On April 2, 2008 Charles Gallagher, appearing for the Petitioner in Family court before Judge Szczur summarized a report mentioned above. This fabricated report of two Gateway Longview associates Stacey Sowinski and Lauren Dombrowski dated March 17, 2008 was used by Charles Gallagher in an effort to keep the Wright children in the custody of foster care.

20. On April 2, 2008 Charles Gallagher, appearing for the Petitioner in Family court before Judge Szczur made multiple false statements in court and he attributed these false statements of his to Laura Wright. Laura Wright is Paul Wright's mother. The Wright were attempting to have their four children placed with Laura Wright when Charles Gallagher made the false statements.

21. In or around the month of March to early April, 2008 Janet Kelly, a foster parent for [REDACTED] and [REDACTED] [REDACTED] did scream in a loud voice at [REDACTED] while shaking her violently by the by the left arm bruising the area of her bicep.

22. In or around the month of March to early April, 2008 Janet Kelly, a then foster parent for [REDACTED] [REDACTED] upon finding a "toy yo-yo" in [REDACTED] pocket proceeded to lock him in a room for over four hours.

23. On or about March 13, 2008 David and Linda Beckinghausen then foster parents for [REDACTED] [REDACTED] had [REDACTED] a child with known disabilities pulled from his school and transferred to Harris Hill Elementary causing additional emotional damage.

24. From about March 1, 2008 to April 16, 2008, Janet Kelly, a then foster parent for ^{E. W.} [REDACTED] and ^{M. W.} [REDACTED] repeatedly told both children that they had "already been adopted" and that "they were starting a new life", adding to the emotional damage of the their seizure from home.

25. From about March 1, 2008 to April 16, 2008, David and Linda Beckinghausen, then foster parents of [REDACTED] repeatedly told both children that they had "already been adopted" and that "they were starting a new life."
^{N. W. + R. W.}

26. From February 29, 2008 to April 16, 2008 no effort to reunite the four Wright children was made by Erie County Dept. of Social Services, Child Protection Services, Erie County Family Court or Judge Margaret O. Szczur even though state law requires them to do so after only thirty days. The Wright's allege that they had no intention of reuniting the children. According to their own records the foster parents already had the Wright children registered for summer camp and a hearing for the termination of parental rights had already been scheduled before the Wright's trial even began.

27. On September 15, 2008 Dr. Corstiaan Brass gave testimony that no parasitic infection existed when we know by the February 10, 2011 results mentioned above that one did indeed exist. No test results consistent with CDC recommendations existed at that time in support of his position at that time and as a medical expert in infectious diseases he should have been aware of this fact. He did not order adequate tests that would allow him to form the strong opinion he testified to. His testimony assisted the county, the court and CPS in continuing their illegal hold on the Wright children and thereby over Paul and Theresa Wright.

28. On September 15, 2008 Dr. Wonhoon Park of Buffalo General Hospital gave testimony that Theresa Wright had suffered from the delusional belief that she had a parasitic infection. As with the information on Dr. Brass above we assert that his testimony was as inaccurate as any testimony could be in light of the medical evidence of February 20, 2011. If his efforts had been more diligent, he may have discovered this fact. We also allege that since his lack of ability to spend any meaningful time with patients on his rounds at BGH, (a few minutes a day) that he formed most of this opinion after consulting with Annmarie Albanese and not on any meaningful time spent with Theresa Wright.

28a. Annmarie Albanese stated in her document of February 29, 2008 that she had communications with staff of Millard Fillmore Suburban Hospital and Buffalo General Hospital, Tonawanda Pediatrics, Family Care Medicine, Amherst University Health Center aka -Amherst Health Center aka -Lifetime Health Medical Group among several other medical professionals and we further assert and believe that she "poisoned the well" with these medical professionals as to what conclusions they arrived at regarding Theresa Wright. Namely that Theresa had a "delusional belief" and was suffering from a "psychotic break."

29. **Question**, if you have a parasitic infection, (in this case two diagnosed types) and you believe that you have a parasitic infection even though the doctors you've seen can't find it and state you don't have it, is that belief of something that you have a delusional belief?

30. On September 18, 2008, under oath, in court, Carolyn Isbrandt of Gateway Longview made contradictory statements under cross examination that strongly suggest that she was coached on what to say regarding the statements of ^{m.w.} [REDACTED] by Charles Gallagher. These statements made in court were in direct ^{m.w.} contradiction to her own notes of the day in question. These statements were regarding what [REDACTED] said about herbal remedies and whether or not he had been given them. Carolyn Isbrandt admitted that her statements made on September 18, 2008 in court had been discussed with Charles Gallagher three or four months after the fact and that his suggestions for her testimony were not consistent with her notes of the day in question. She testified that it was Charles Gallagher who initiated the conversation about the subject three or four month after her talks with ^{m.w.} [REDACTED] where he denied taking the herbal supplements. Gallagher's "suggestions" made to Isbrandt during his conversation with her would seem to suggest that she testify that [REDACTED] said the exact opposite of what he in fact said and what her notes of that day had indicated ^{m.w.}

31. On September 18, 2008, under oath, in court, Carolyn Isbrandt admitted she made false statements under oath about ^{m.w.} [REDACTED] and an herbal supplement.

32. On October 1, 2008, under oath, in court, Annmarie Albanese, a caseworker for CPS, lied about using coercion in an effort to gain entry to the Wright home on February 15, 2008.

33. On October 1, 2008, under oath, in court, Annmarie Albanese, a caseworker for CPS, admitted to knowingly presenting false information on her application to Judge Margaret O. Szczur for a warrant to seize the four Wright children. We can not know for certain if this application was presented to Judge Szczur on February 29, 2008 or at some later date as there exists no evidence of any pre-deprivation hearing.

34. On October 1, 2008, under oath, in court, Annmarie Albanese, a caseworker for CPS, admitted to conducting and interview of a minor child on private property, (the Wright family home). She did this without prior consent and without a parent present in the room.

35. On February 11, 2009 Dr Brian S Joseph gave testimony claiming that a parasitic infection was a "delusion." His position assisted the county in the continuance of their invasion of the Wright family privacy.

36. On or about October 20, 2009, Paul Wright received a phone call from a Yvonne Rychcik, a caseworker with CPS. She informed Mr Wright that she had received a "report" about "suspected neglect". She told Mr Wright that the report to the "hotline" was made by Phil Pawlowski, a supervisor with CPS. The report was malicious fabrication of Phil Pawlowski's

37. A trial was set in June of 2008 for Paul and Theresa Wright. Judge Margaret O. Szczur did not allow the Wright's a trial by jury even though the "value in controversy" did far "exceed twenty dollars".

38. On February 14, 2008 Theresa Wright went to the emergency room of Millard Fillmore Suburban complaining of "abdominal pain" in fact when asked she ranked the pain an "8-9" out of a range of ten.

39. Dr. David James examined her then left the examination room for a few minutes. Upon returning he announced to Theresa, "CPS is looking for you, you're going to Buffalo General for psychiatric evaluation".

40. Hospital records indicate that a Dr. Cheryl Neely, without examining Theresa, signed a document along with Dr. David James to send Theresa Wright to Buffalo General committing an unlawful imprisonment of Theresa Wright.

41. From about February 14 to about June of 2008, without a release from Paul or Theresa Wright or a valid order of a court, Dr. David James, Dr. Cheryl Neely together with numerous other employees of Millard Fillmore Suburban Hospital and Kaleida Health did discuss, release and distribute the federally protected health information of Paul and Theresa Wright to individuals not authorized to receive such protected information including but not limited to the defendants listed above. This information was then disseminated by defendants mentioned above and used against Paul and Theresa Wright to seize their four minor children.

42. Paul and Theresa Wright had more than a "reasonable" expectation of privacy in regards to this information described above. Dr. David James, Dr. Cheryl Neely together with numerous other employees of Millard Fillmore Suburban Hospital and Kaleida Health worked in concert with numbers of the above named defendants and would have or should have known that this information would be used in an attempt to damage the Wright family.

43. From about February 14 to about June of 2008, without a release from Paul or Theresa Wright or a valid order of a court, Dr. McCormack, Dr. Wonhoon Park together with numerous other employees of Buffalo General Hospital and Kaleida Health did discuss, release and distribute the federally protected health information of Paul and Theresa Wright to individuals not authorized to receive such protected information including but not limited to the defendants listed above. This information was then disseminated by defendants mentioned above and used against Paul and Theresa Wright to seize their four minor children.

44. Paul and Theresa Wright had more than a "reasonable" expectation of privacy in regards to this information. Dr. McCormack, Dr. Wonhoon Park together with numerous other employees of Buffalo General Hospital and Kaleida Health worked in concert with numbers of the above named defendants and would have or should have known that this information would be used in an attempt to damage the Wright family.

45. On or about January 23, 2008 through to June, 2008, Dr. Justin Kanaley, Dr. Marybeth Lopat-Winter, Sandie Yeater, Marylou Weaver, Sharon Novak together with other employees of Tonawanda Pediatrics did discuss, release and distribute the federally protected health information of Paul and Theresa Wright to individuals not authorized to receive such protected information including but not limited to the defendants listed above. This information was then disseminated by defendants mentioned above and used against Paul and Theresa Wright to seize their four minor children.

46. Paul and Theresa Wright had more than a "reasonable" expectation of privacy in regards to this information. Dr. Justin Kanaley, Dr. Marybeth Lopat-Winter, Sandie Yeater, Marylou Weaver, Sharon Novak together with other employees of Tonawanda Pediatrics worked in concert with numbers of the above named defendants and would have or should have known that this information would be used in an attempt to damage the Wright family.

47. On or about January 23, 2008 through, June 2008 Dr. James Panzarella together with other employees of Family Care Medicine did discuss, release and distribute the federally protected health information of Paul and Theresa Wright to individuals not authorized to receive such protected information including but not limited to the defendants listed above. This information was then disseminated by defendants mentioned above and used against Paul and Theresa Wright to seize their four minor children.

48. Paul and Theresa Wright had more than a "reasonable" expectation of privacy in regards to this information. Dr. James Panzarella together with other employees of Family Care Medicine worked in concert with numbers of the above named defendants and would have or should have known that this information would be used in an attempt to damage the Wright family.

49. On or about January 13, 2008, Dr. Barbara Stouter together with other employees of Amherst University Health Center and Lifetime Health Medical Group all located on Sweethome Rd in Amherst, NY did discuss, release and distribute the federally protected health information of Paul and Theresa Wright to individuals not authorized to receive such protected information including but not limited to the defendants listed above. This information was then disseminated by defendants mentioned above and used against Paul and Theresa Wright to seize their four minor children.

50. Paul and Theresa Wright had more than a "reasonable" expectation of privacy in regards to this information exchanged on this January 13th encounter. Dr. Barbara Stouter together with other employees of Amherst University Health Center and Lifetime Health Medical Group worked in concert with numbers of the above named defendants and would have or should have known that this information would be used in an attempt to damage the Wright family.

51. On or about February 20, 2008 Horizons Health Services did discuss, release and distribute the federally protected health information of Paul and Theresa Wright to individuals not authorized to receive such protected information including but not limited to the defendants listed above. This information was then disseminated by defendants mentioned above and used against Paul and Theresa Wright to seize their four minor children.

51a. Paul and Theresa Wright had more than a "reasonable" expectation of privacy in regards to this information. Horizons Health Services worked in concert with numbers of the above named defendants and would have or should have known that this information would be used in an attempt to damage the Wright family.

52. On or about January 20, 2010 Emil Cappelli filed a response to an appeal of a Family court decision with the NY Appellate Division, Fourth Dept. that contained statements he should have reasonably know to be false.

53. On or about June 11, 2010 The NY Appellate Division, Fourth Dept. released a decision regarding a Family Court case involving Paul and Theresa Wright.

53a. The document contained as part of the decision, statements presented by The NY Appellate Division, Fourth Dept. as "fact" that are not found anywhere in the fact finding portion of the Family Court trial record. It appears that they simply made things up.

54. On or about February, 2008 Mr. Cappelli, Erie county attorney did assisted Annmarie Albanese in preparing the application contained false statements for seizure of the Wright children.

55. On or about February, 2008, Mr James Brown, an attorney for Erie county did assisted Annmarie Albanese in preparing the application contained false statements for seizure of the Wright children.

56. In a document dated January 23, 2008, Annmarie Albanese submitted into the CPS record and sent to Dr. Brass a HIPPA release document that contained a forged signature of Theresa Wright. This document was also submitted to the Family court as evidence.

The Federal basis for these claims are: 18 U.S.C. § 1621, 18 U.S.C. §§ 1962, and 1964, 42 U.S.C. §§ 1983, 1988 and the First, Fourth, Fifth, Seventh, Eighth, Fourteenth Amendments of the Constitution of the United States of America and HIPAA of 1996


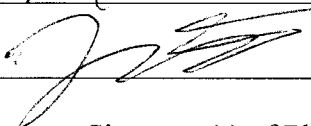
6. SUMMARY OF RELIEF SOUGHT

1. We ask that the court take action to prevent the above described violations from ever happening to other children and families in the future.
2. We ask that the Court set aside the Erie County Family Court Decision & Order Docket Nos. NN-3363-08.
3. We ask for an order of protection against all defendants listed above.
4. We seek compensation in the amount of ten million dollars for each of the six Plaintiffs listed above or a total of sixty million dollars, (\$60,000,000.00) for the senseless, extreme and protracted violations of our Constitutionally protected rights, for the attempted breakup of our intact family and for the severe emotional damage that it caused.

Do you want a jury trial? Yes X No

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 2-15-11

Signature(s) of Plaintiff(s)